

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL -6 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARIANNE STEWART,

Defendant.

4:16CR290 RLW/NCC

INDICTMENT

COUNTS 1-3

Title 18, United States Code, Section 641 and Section 2
Theft of Government Property or Funds

The Grand Jury charges that:

BACKGROUND

1. At all times relevant to this indictment, defendant Arianne Stewart, a resident of St. Louis, Missouri, was not working or enrolled in college classes. At all times relevant to this indictment, Arianne Stewart had three children.

Relevant Child Care Assistance Program Provisions

2. The Child Care and Development Block Grant Act provides federal block grants to states, territories, and tribes for child care assistance to low income families. The United States Department of Health and Human Services, Office of the Administration for Children and Families, administers the Child Care and Development Fund ("CCDF") at the federal level. The stated purpose of the CCDF is to enable low-income families to obtain and retain employment or the skills and education necessary to obtain employment.

3. The Missouri Department of Social Services ("DSS"), Family Support Division ("FSD"), is responsible for the Child Care and Development Program in Missouri. Missouri

contributes to the child care assistance program through its Early Childhood and Development fund and state general revenue.

Eligibility

4. Each state administering child care assistance programs, under a federal CCDF grant, determines the eligibility requirements for families within the state. To be eligible for the Missouri Child Care Assistance program, applicants must be low-income, have children, and be working, disabled, or enrolled in qualified education or job training programs. When an individual is found eligible for the child care assistance program, DSS will provide financial assistance for child care for an individual child by paying the full or partial child care costs.

Application for Child Care Assistance

5. To receive child care assistance, the applicant must submit an application, in-person, online, or by mail, to a local FSD office. During the application process, the applicant completes and signs a Child Care Application or a Child Care Reapplication/ Review Form. The applicant must provide his or her contact information, the names of the children, the names and addresses of the child care providers, and the need for child care. By signing the Child Care Application or Child Care Reapplication/Review Form, the applicant certifies that the answers he or she provided are true, correct, and complete, that the applicant agrees to provide additional verification or information as requested, and that the applicant understands his or her statements are subject to investigation and verification.

6. During the period relevant to this indictment, defendant Arianne Stewart submitted certified Child Care Application/Reapplication forms to the FSD office on six occasions.

7. The applicant for child care assistance is also interviewed as part of the application process. After the interview, an Interview Summary is generated, which the

applicant must certify. The Interview Summary contains the applicant's contact information, the names of the children, and the stated child care need. By signing the Interview Summary, the applicant certifies that the answers he or she provided are true, accurate, and complete. During the period relevant to this indictment, defendant Arianne Stewart submitted one certified Interview Summary form to the FSD office.

Child Care Verification and Reimbursement

8. The FSD office requires verification of child care need. In general, verification requires proof of work or school schedule, and for college students, proof of financial aid. During the period relevant to this indictment, defendant Arianne Stewart submitted proof of enrollment in college classes to the FSD office on six occasions.

9. Child care payments, totaling \$46,858.21, were made on the behalf of Arianne Stewart's three children during the service months from November 2010 to November 2014.

DESCRIPTION OF FRAUD

10. Beginning in or about 2010 and continuing to in or about 2015, defendant Arianne Stewart knowingly submitted false documents, including class schedules, as proof of her enrollment in college courses. Arianne Stewart knew at the time she submitted the false documents that she was not enrolled at Everest College or any other school. Some of these false documents are described below.

Everest College

11. Records reflect that defendant Arianne Stewart was a student at Everest College from October 27, 2008 to July 6, 2009 and at no other time. On or about the dates indicated below, Arianne Stewart submitted to FSD false and fraudulent documents as proof of her need for child care:

Date	Type of Document	False Statement
October 1, 2010	Certified Interview Summary	Child care need: "College"
October 1, 2010	Letter signed by Everest College Admissions Representative	Attends classes Monday-Friday from 8am-4pm, present-June 6, 2011
September 1, 2011	Certified Child Care Reapplication form	Child care need: "attending school" at "Everest" from "8-5"
November 8, 2011	Certified Child Care Application	Child care need: "attend school" at "Everest College"
November 8, 2011	Letter signed by Everest College Admissions Representative	Attends classes Monday-Friday from 8am-4pm, present-September 6, 2012
August 6, 2012	Certified Child Care Application	Child care need: "attend school"
August 6, 2012	Letter from Everest College Admissions Representative	Attends classes Monday- Friday from 8am-4pm, September 10, 2012-August 30, 2013
April 2, 2013	Letter from Everest College Admissions Representative	Attends classes Monday- Friday from 8am-4pm, present-May 6, 2014
May 30, 2014	Certified Child Care Application	Child care need: "attend school" at "Everest College"
May 30, 2014	Letter from Everest College Admissions Representative	Attends classes Monday- Friday from 8am-4pm, present-November 3, 2014
June 5, 2015	Letter signed by Everest College Admissions Representative	Attends classes Monday- Friday from 9am-4pm, present-December 6, 2015

12. On about the dates listed below, within the Eastern District of Missouri,

ARIANNE STEWART,

the defendant herein, did embezzle, steal, purloin, and knowingly convert to her use money and items of the United States and of any department or agency thereof, and any property made or being made under contract for the United States and any department or agency thereof, to wit: government funds, in excess of \$1000, in the amounts listed below:

<u>COUNT</u>	<u>SERVICE DATES</u>	<u>PAID AMOUNT</u>
1	August 2013	\$1090.60
2	September 2013	\$1020.26
3	August 2014	\$3131.08

In violation of Title 18, United States Code, Section 641 and Section 2.

COUNT 4
Title 18, United States Code, Section 1028(a)(1) and Section 2
Identity Theft

The Grand Jury further charges that: _____

13. Paragraphs 1 through 11 are incorporated by reference as if fully set out herein.
14. On or about November 8, 2011, within the Eastern District of Missouri,

ARIANNE STEWART,

the defendant herein, did knowingly and without legal authority produce an identification document, authentication feature, and false identification document, that is, she used the name and signature of Casey Wendling, an employee of Everest College, on a fraudulent letter to verify school enrollment for the purposes of obtaining child care that she was not eligible to receive under the Child Care Assistance Program.

All in violation of Title 18, United States Code, Section 1028(a)(1) and Section 2.

COUNT 5
Title 18, United States Code, Section 1028(a)(1) and Section 2
Identity Theft

The Grand Jury further charges that:

15. Paragraphs 1 through 9 are incorporated by reference as if fully set out herein.

16. On or about June 5, 2015, within the Eastern District of Missouri,

ARIANNE STEWART,

the defendant herein, did knowingly and without legal authority produce an identification document, authentication feature, and false identification document, that is, she used the name and signature of Readie Wallace, an employee at Bellefontaine Gardens, on a fraudulent letter concerning her employment.

All in violation of Title 18, United States Code, Section 1028(a)(1) and Section 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

DOROTHY L. McMURTRY, #37727MO
Assistant United States Attorney